

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-40 (SRN/BRT)

UNITED STATES OF AMERICA,

SUPERSEDING INDICTMENT

Plaintiff,

18 U.S.C. § 1591

18 U.S.C. § 1594

v.

18 U.S.C. § 1952

21 U.S.C. § 853

CHARLES WILLIAM DEXTER III,

21 U.S.C. § 2461

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Sex Trafficking of a Minor)

From on or about August 12, 2020 through on or about August 14, 2020, in the State and District of Minnesota, the defendant,

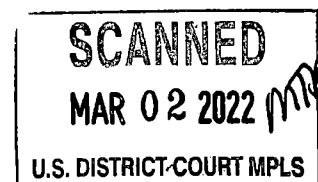
CHARLES WILLIAM DEXTER III,

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained Victim A to engage in a commercial sex act and attempted to do so, knowing and in reckless disregard of the fact and having had a reasonable opportunity to observe that Victim A had not attained the age of 18 years, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c), and 1594(a).

COUNT 2

(Sex Trafficking by Force, Fraud, and Coercion)

From on or about June 29, 2020 through on or about August 14, 2020, in the State and District of Minnesota, the defendant,



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CHARLES WILLIAM DEXTER III,

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained Victim A, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause Victim A to engage in a commercial sex act, and attempted to do so, all in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), and 1594(a).

COUNT 3

(Use of Interstate Facility To Promote Unlawful Activity)

On or about August 13, 2020, in the State and District of Minnesota, the defendant,

CHARLES WILLIAM DEXTER III,

used a facility in interstate commerce, that is, a cellular telephone and the Internet, namely, MegaPersonals.eu, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of any unlawful activity, that is, a business enterprise involving sex trafficking and prostitution offenses in violation of the laws of the United States and the State of Minnesota, and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity, all in violation of Title 18, United States Code, Section 1952(a)(3).

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FORFEITURE ALLEGATIONS

Counts 1, 2, and 3 of this Superseding Indictment are fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594, Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

As a result of the offenses charged in Counts 1 and 2, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594(d):

(1) any property, real or personal, involved in, used or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to such property; and

(2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense, or any property traceable to such property.

The property subject to forfeiture includes, but is not limited to, the following property seized from the defendant on August 14, 2020 and August 19, 2020:

- a. \$1595.33 in U.S. Currency;
- b. A black .40 caliber Springfield Armory handgun, bearing serial number US470957; and
- c. A black LG cell phone.

As a result of the offense charged in Count 3, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and

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Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 1591(a), 1591(b), 1591(c), 1594(a), and 1594(d).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON